

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Harrisonburg**

RLI INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 5:18CV00066-MFU-JCH
)	
NEXUS SERVICES, INC.,)	
LIBRE BY NEXUS, INC.,)	
HOMES BY NEXUS, INC.,)	
)	
Defendants.)	
_____)	

MOTION FOR ISSUANCE OF WRIT OF GARNISHMENT

Pursuant to applicable Federal Rules of Civil Procedure, including Rule 64, Plaintiff/Judgment Creditor RLI Insurance Company (“RLI”), through its undersigned counsel of record, hereby motion this Court to issue a writ of garnishment after judgment by stating that:

1. On October 28, 2020, this Court entered Judgment against Nexus Services, Inc., Libre by Nexus, Inc. and Homes by Nexus, Inc. (“Judgment Debtor”), for the amount of \$3,331.197.55.
2. To date, there still remains due and unpaid a balance of \$3,014,477.82 on the Judgment.
3. RLI motions this Court to issue a Writ of Garnishment to Judgment Debtor’s affiliate as follows: Subversivo LLC, c/o David See, Manager, 1201 Fannin Street, Suite 262, Houston, Texas 77002.

Dated: January 5, 2024

RLI INSURANCE COMPANY

/s/ Dustin M. Paul

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